

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:
All Actions

**THE PLAINTIFFS' STEERING COMMITTEE'S
MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

Pursuant to Local Rule 7.2, Plaintiffs' Steering Committee ("PSC") respectfully requests that the Court allow the Exhibits to the *Declaration of Michael Coren*, appended to Plaintiffs' Surreply to the Premier Defendants' Motion to Dismiss, to be filed under seal.¹

The Exhibits to the *Coren Declaration* are medical records, prescription records, and billing records containing protected patient-specific information. They include patient names, diagnoses, descriptions of procedures, as well as dates of treatment. Though the *Declaration of Michael Coren* was filed some time ago; the PSC recently became aware that certain exhibits containing protected information are not formally before the Court in unredacted form.

Though this information is properly produced in the context of this litigation, this information is not generally available to the public. For the reasons set forth in Plaintiffs' Surreply, this information is relevant to the issues before the Court. But there is no public interest in making such information generally available. And the PSC believes that privacy interests of the individuals dictate that the documents be sealed.

WHEREFORE, the Plaintiffs' Steering Committee respectfully requests that the Court allow the Exhibits to the *Declaration of Michael Coren* be filed under seal.

¹ Plaintiffs' Surreply to Premier Defendants' Motion to Dismiss [ECF No. 1097] and the Declaration of Michael Coren [ECF No. 1097-1] were originally filed on April 23, 2014.

Dated: June 3, 2014

Respectfully Submitted,

/s/ Kristen A. Johnson

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Kristen A. Johnson, hereby certify that I caused a copy of the above *Motion for Leave to File Exhibit Under Seal* to be filed electronically via the Court's electronic filing system.

Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: June 3, 2014

/s/ Kristen A. Johnson

Kristen A. Johnson, BBO # 667261